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E & WIRELESS RECEIVED USA

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FEDERAL COMMUNICATIONS COMMUNICATIONS OFFICE OF THE SECRETARY

Cable & Wireless, Inc.

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www.cw-usa.net

Telephone (703) 790-5300

April 9, 1999

Magalie Roman Salas Secretary Federal Communications Commission 445 12th St. S.W. TW-A325 Washington, D.C. 20554

RE:

Ex Parte Presentation CC Docket No. 98-170

Truth in Billing

Dear Ms. Salas,

On April 8, 1999, Rachel Rothstein and I met with Linda Kinney, Legal Advisor to Commissioner Ness, to discuss Cable and Wireless' positions in the above-mentioned docket. The attached materials summarize our presentation.

An original and one copy of this response are being filed with your office, in accordance with the Commission's rules. Acknowledgment and date of receipt are requested.

Sincerely,

Brent M. Olson

Senior Regulatory Counsel Cable & Wireless USA, Inc.

SAM ON

703-760-3865

Attachment

Cc:

Linda Kinney

No. of Copies rec'd O+ List A B C D F

CABLE & WIRELESS USA, INC.

EX PARTE PRESENTATION CC DOCKET NO. 98-170 April 5, 1999



Recommended Action

- Guidelines, not rules.
- Focus on residential, not business, customers.
- Target Solutions to particular problems.
- No mandatory language for USF and PICC charges.



Guidelines Are Preferable To Rules

- Guidelines allow billing to remain a competitive tool.
- Guidelines allow billing technologies to continue rapid evolution.
- Guidelines reflect appropriate cost/benefit analysis.



Billing Is A Competitive Tool

- Carriers use distinctive billing capabilities to win and retain customers.
- Detailed and rigid rules could significantly impair a carrier's ability to differentiate itself.



Billing Options Are Multiplying Rapidly

- Invoicing increasingly is electronic and paperless.
- Bills increasingly are used as tools to provide one-stop shopping.
- Detailed and rigid rules could hinder development in billing efficiency.



Guidelines Reflect Appropriate Cost/Benefit Analysis

- Guidelines promote billing clarity, not billing uniformity.
- Guidelines balance public interest goals of clearer, simpler format and presentation with carrier costs and system limitations.



Guidelines Should Focus On Residential Customers

- Residential customers are more at risk from unscrupulous service providers.
- Businesses require and demand more detailed, flexible invoices to track costs and preserve their own competitive edge.



Guidelines Should Be Targeted At Particular Problems

- Many of the Commission's proposals are directed at the confusion caused by third party billing, but appear to apply to all service providers.
- Non-targeted solutions could impose significant unintended costs and burdens on service providers.



The FCC Should Not Mandate Specific Language for USF and PICC Charges

- Any Commission action should be focused on the prevention of false or misleading statements, not on a carrier's chosen method to collect these charges.
- Any safe harbor language must accommodate the differences in and limitations of carriers' billing systems.



Sales Bulletins

The Universal Service Charge (USC) & Presubscribed Interexchange Carrier 1/98 Charge (PICC)

Bill Insert	Competitive Info: PICC	Q&A: PICC	Competitive Info: USC	Q&A: USC

Bill insert

New Federal Charges Go into Effect Immediately

You will see two new line items on your long distance bill beginning with this invoice.

The "Universal Service Charge" is the result of an order issued by the Federal Communications Commission as part of its Universal Service Reform. The FCC designed the Universal Service Fund program to ensure the delivery of affordable telecommunications service to all Americans. The Universal Service Fund will be used to support access to basic telecommunications services for low-income and rural consumers, and access to advanced telecommunications services for eligible schools, libraries, and rural health care providers. The charge will be calculated as 4.9 percent of usage and fees, excluding local and in-state usage. This 4.9% rate may vary on a quarterly basis depending on how much revenue the FCC determines is necessary to support universal service programs.

If you would like more information on the Universal Service Charge, please call 1-888-873-2250. You may also visit Universal Service Administrative Corporation's website at http://www.neca.org or the FCC homepage at http://www.fcc.gov/ccb/universal_service/.

The "Presubscribed Interexchange Carrier Charge" represents a new charge that the FCC requires all long distance companies to pay to local telephone companies for access to their local networks. Initially we will recover this charge as 3.9 percent of usage and fees, excluding local and in-state usage. Once all local telephone companies can provide us with more specific information, we will base this charge on the actual number of access lines or trunks that each customer has presubscribed to Cable & Wireless.

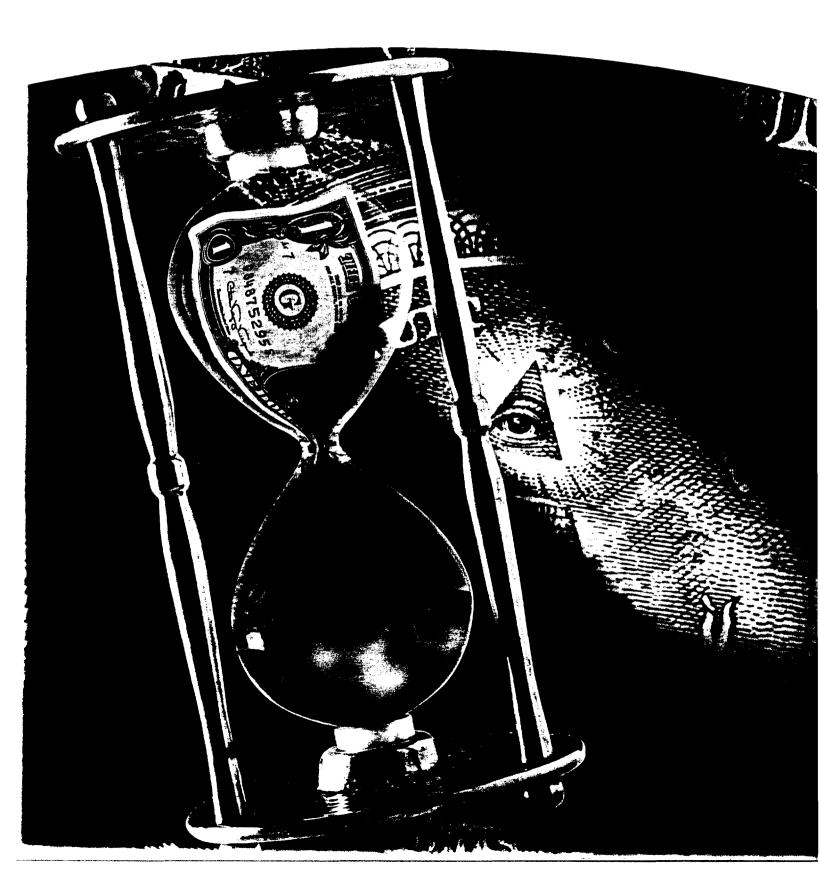
If you would like more information on the Presubscribed Interexchange Carrier Charge, please call 1-888-742-2007.





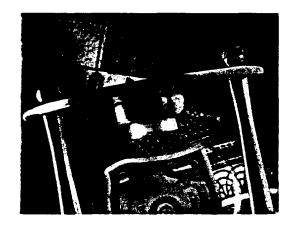
The Intelligent Bill

Smart Solutions for Managing Telecom Expenses



Save Time and Reduce Telecom Expenses

with The Intelligent Bill



This is one bill that you won't want to send directly to the accounts payable department. That's because it provides insightful management information — information you can use to control expenses, save administrative time, spot trends that impact your business, and gain a competitive edge against your competitors.

The Intelligent Bill from Cable & Wireless helps businesses . . .

- Reduce costs dramatically by monitoring and controlling unauthorized calls
- Eliminate the time it often takes to bill back phone charges to clients, projects, and cost centers . . . even automatically add a markup to recoup overhead costs
- Optimize staffing of toll-free numbers to capture more business opportunities on the first ring
- Assess employee productivity on the phone so you can provide coaching to employees as necessary
- And much more.

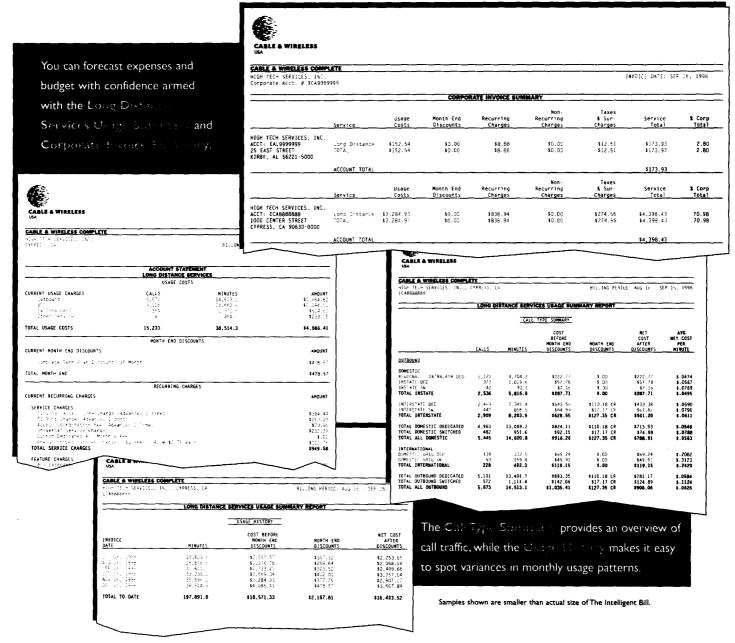
Unlike in-house call accounting systems, Cable & Wireless' intelligent billing solutions don't require any special equipment, support personnel, or maintenance. You automatically receive the information with your monthly invoice. And of course, our intelligent billing solutions are also available to multi-national companies that use our Global Intelligent Virtual Network (GIVN) services.



Gain Insight with Management Reports

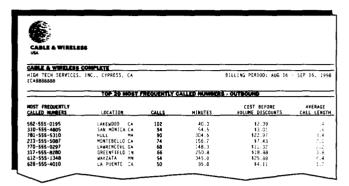
When you choose Cable & Wireless as your long distance company, you can also choose from more than 50 different management reports. But rest assured you won't be inundated with paper that you don't want or need. A Cable & Wireless representative will help customize a report package to fit the specific needs of your business. And you have the option of receiving reports electronically.

For quick and easy reference, your Intelligent Bill package will always include a management report index listing the types of reports.



Get the Level of Detail You Want

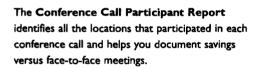
The **Top 20 Most Frequently Called Numbers Report** gives you valuable insight into where your employees are focusing their efforts and could indicate the need for face-to-face visits with certain customers. This report is also available for Toll-Free and Calling Card Calls.

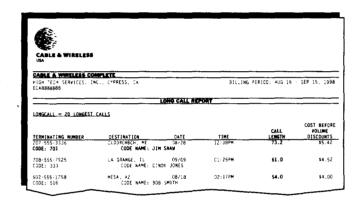


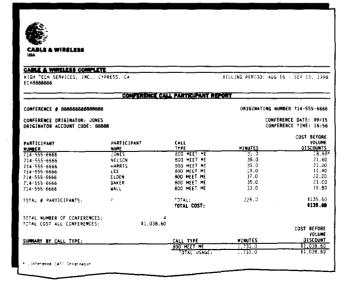
The 800 Incomplete Call Attempt Report uncovers the need for additional toll-free lines and lists the phone numbers of the callers who couldn't get through so you can follow-up on these business opportunities.

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CABLE & WIRELESS			
CABLE & WIRELESS COR			
HIGH TECH SERVICES, IN ECABB <mark>8888</mark>	C., GYPRESS, CA	Blucing PERIOD: 4	NJG 15 - SEP 15, 199
	800 INCOMPLETE CAL	LATTEMPT REPORT	
800 NUMBER: 800-999-886	88		
		ORIGINATING	ORIGINATING
DATE	TINE	HAMPER	LOCATION
09/C2	3:21:41PM	701-555-5146	GRANDFORKS I
09/11	3:53:59PM	804-555-6061	SO BOSTON V.
09/13	4:07:07PM	562-555-5072	PICORIVERA (
C9/15	5:51:22PM	956-555-5635	DONNA T
TOTAL 800-999-8888		•	4 CALL ATTEMP
800 NUMBER: 800-999-666	66		
		ORIGINATING	DRIGINATIN
			LOCATION
DATE	TIME	NUMBER	COCATION
08/17	7:26:03AM	104-555-2995	N JV23ROCM
08/17 08/17	7:26:03AM 7:27:43AM	704-555-2995 770-555-9362	M JV23POCM E HTUJUG
58/17 68/17 68/19	7:26:03AM 7:27:43AH 7:28:35AM	704 - 555 - 2995 770 - 555 - 9362 770 - 555 - 9058	MOORESVL N BULUTH 3 BULUTH 3
08/17 08/17 08/19 09/25	7:26:03AM 7:27:43AM 7:28:35AM 9:33:21AM	704-555-2995 770-555-9362 770-555-9058 718-556-5723	MOORESVE N DJEUTH 3 CHEUTH 3 SPOOREYN N
08/17 08/17 08/19 09/25 06/26	7:26:03aM 7:27:43aM 7:28:36aM 7:33:21aM 7:36:07aM	704-555-2995 770-555-9362 770-555-9368 710-555-958 116-555-723 616-555-3414	MOORESVL N DULUTH 3 DULUTH 3 SROOKLYN N FRAVERSECY
98/17 98/17 98/19 99/25 98/26 98/26	7:26:03AM 7:27:43AM 7:28:36AM 7:33:21AM 7:36:07AM 7:42:16AM	704-555-2995 770-555-9362 770-555-9058 716-555-5723 616-555-0144 734-555-0305	MOORESVE N DULUTH S DULUTH S BROOKET S TRAVERSECT S PLYMOUTH M
08/17 08/17 08/17 08/19 09/25 08/26 08/26	7:26:03AM 7:27:43AM 7:28:35AM 7:33:21AH 7:35:07AM 7:42:15AM 7:44:10AM	704-555-2995 770-555-9362 770-555-9058 716-555-5723 616-555-0414 734-555-9305 704-555-9769	MODRESUL M DULUTH 3 DOLUTH 3 SPOOKLYN N FRANKERSECY 1 PLYMOUTH M "ROUTMAN N
58/17 68/17 78/19 19/25 68/26 68/26 68/27	7:26:03AM 7:27:43AM 7:28:35AM 7:33:21AM 7:33:21AM 7:42:15AM 7:42:10AM 7:44:704AM	704-555-2995 770-555-9582 770-555-9058 116-555-7723 616-555-0414 124-555-0305 704-555-9759 205-555-5135	MODRESUL N DULUTH S DULUTH S POUNTH T TRAVERSECT PLYMOUTH N TROUTH N ALABASTER A
58/17 68/17 78/19 69/25 68/26 68/26 68/26 69/07 69/06 55/11	7:26:03aM 7:27:43aM 7:28:35aM 7:38:71aM 7:33:71aM 7:42:15aM 7:42:15aM 7:44:10aM 7:45:55aM	704-555-2995 770-555-3962 770-555-3968 118-555-5723 616-555-30414 124-555-3305 74-555-7265 605-555-5135 605-555-51372	MODRESUL N DULUTH S DULUTH S POUNTH T TRAVERSECT PLYMOUTH N TROUTH N ALABASTER A
58/17 68/17 78/19 19/25 68/26 68/26 68/27	7:26:03AM 7:27:43AM 7:28:35AM 7:33:21AM 7:33:21AM 7:42:15AM 7:42:10AM 7:44:704AM	704-555-2995 770-555-9582 770-555-9058 116-555-7723 616-555-0414 124-555-0305 704-555-9759 205-555-5135	MODRESVL N DULUTH G DULUTH G PRODNING N FRAVERSECY M PLYMOUTH M TROUFMAN N ALABASTER A MARION S
08/17 08/15 08/15 08/25 08/25 08/26 08/26 08/26 08/21 08/21	7:26:03AM 7:27:43AM 7:28:35AM 7:28:35AM 7:33:73AM 7:33:73AM 7:45:13AM 7:45:13AM 7:45:55AM 7:45:55AM	704-555-2995 770-555-9969 770-555-9969 118-555-9723 616-555-9744 174-555-9785 605-555-1972 407-535-9769	MODRESVL N DULUTH S DOLUTH S SPONELYN S FRAVERSECY ! P./MOUTH M TROUFMAN N ALABASTER A MARION S AINTERPARK

The Long Call Report used with employee account codes can point out the need for employee training in making shorter, more productive calls, or it may indicate other problem areas that need to be checked.

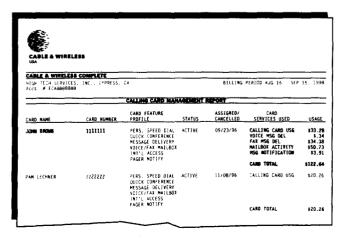






Samples shown are smaller than actual size of The Intelligent Bill.

With the Calling Card Management Report you can track and analyze out-of-office calls just as easily as if the calls were made through your own phone system.





Simplify Call Accounting

When you receive your Intelligent Bill, the Summary Reports will give you a complete picture of all calls made with the same account code including calling card or conference calls.

itemize

the complete details of each call so that you can track usage costs by employee, cost center, client or project.

saves

administrative time by eliminating the need to manually assign charges to clients or cost centers.



CABLE & WIRELESS COMPLETE HIGH TECH SERVICES, INC., CYPRESS, CA ECA8888888



CABLE & WIRELESS COMPLETE

HIGH TECH SERVICES, INC., CYPRESS, CA ECABB88888

BILLING PERIOD: AUG 16 - SEP 15, 1998

 	 	 CALL	DETAIL	KEPU

ACCOUNT CODE: 701 ACCOUNT NAME: JIM SHAW

υL	TBO	UND

		TERMINATING	TERMINATING		
DATE	TIME	NUMBER	LOCATION	MINUTES	COST
09/14	10:13:41AM	216-555-6161	CLEVELAND OH	.5	\$.06
09/14	10:16:09AM	216-555-6161	CLEVELAND OH	,5	\$.06
09/14	10:28:20AM	216-555-5151	CLEVELAND OH	3.1	\$.33
09/14	11:09:54AM	704-555-5848	CHARLOTTE NC	3.5	\$.37
09/14	3:10:3IPM	876-555-6855	JAMAICA	2.2	\$1.76
09/14	3:40:14PM	52-55568365	MEXICLI LOMX	5.0	\$1.45
09/14	9:00:36PM	33-555800333	FRANCE	1.0	\$.29
09/15	10:42:10AM	770-555-1405	DULUTH GA	1.9	\$.20
09/15	11:21:16AM	770-555-1405	DULUTH GA	2.7	\$.29
09/15	11:43:59AM	912-555-7577	ST MARYS GA	.5	\$.06
09/15	11:48:27AM	912-555-7577	ST MARYS GA	.5	\$.06
09/15	11:50:16AM	921-555-7577	ST MARYS GA	.5	\$.06
09/15	11:54:21AM	423-555-0707	CLEVELAND TN	1.0	\$.11
09/15	1:25:00PM	718-555-5558	QUEENS NY	1.5	\$.16
09/15	2:24:26PM	419-555-1517	MANSFIELD OH	.6	\$.07
TOTAL OUTBOUND		121 CALLS		173.6 MINS	\$33.30

ACCOUNT CODE	CALL TYPE	NAME/NUMBER	CALLS	MINUTES	COST
701	OUTBND	BUSINESS LINES D	121	173.6	\$33.30
JIM SHAW	800	888-555-2222	16	79.3	\$20.89
	CCARD	ALL CARDS	. 7	58.2	\$37.73
ACCOUNT CODE TOTAL			144	311.1 (0.3% OF TOT/	\$91.92 (L COSTS)
769					
SALLY FIELDS	OUTBND	BUSINESS LINES D	4	18.0	\$1.78
ACCOUNT CODE TOTAL			4	18.0	\$1.78
				(0.2% OF TOTA	AL COSTS)
342					
DAN COOPER	OUTBND	BUSINESS LINES D	2	2.3	\$0.25
ACCOUNT CODE TOTAL		2	2.3	\$0.25	
				(0.0% OF TOTA	(COSTS)
O ACCT CODE USED	OUTBND	BUSINESS LINES	16	17.3	\$4.86
		714-555-1676 F	112	117.7	\$27.23
	800	888 -555-7 82 0 17	70.4	\$8.80	
		888-555-4849 31	152.2	\$19.88	
NO ACCOUNT CODE TOTAL			176	357.6	\$60.77
				(7.3% OF TOTA	AL COSTS)
TOTAL USAGE			2.425	6,698.3	\$833.34
				(100.0% OF TOTA	(L COSTS)
- Fax					
) = Dedicated					

Put our other valuable reports to work for you as well, such as Time of Day, Day of Week, Exception Reports, Area Code Reports, Summary Report by Number, and other Calling Card Reports.

Samples shown are smaller than actual size of The Intelligent Bill,

Enhanced

Account Code Features



You can select from a wide range of call accounting, as demonstrated in the solutions chart. Your Cable & Wireless representative can help analyze your business needs and then recommend the best combination of features to meet those needs. Some of our enhanced capabilities are highlighted below.

Business Need	Cable & Wireless Solutions	Benefits
Break down calls by employees, cost centers, clients, etc.	Any type of account code	 Makes it easy to verify calls and charge back costs Discourages unauthorized calls
Add a mark up to long distance calls for bill-back purposes	Capture® Billing	 Generates a client-ready invoice, complete with mark up Allows you to recoup your overhead costs
Break down calls by 2 levels of detail, such as employee and client or employee and dept.	Precision sM Billing	Tracks employee productivity overall as well as identifies billable charges
See employee, cost center, or client name printed on Call Detail Reports in addition to (or instead of) the account code	Alpha Account Codes	Eliminates need to manually cross reference account code numbers to names Protects confidentiality of codes
Assign and deny calling privileges	Programmable Security Codes	 Ensures 100% accountability of calls made Lets you set up and revoke call privileges on a moment's notice
Free up storage space	Electronic Billing	 Provides bill on diskette or CD-ROM, eliminating the need to file paper bills



Get Online

with Electronic Billing

You can receive your monthly invoice and management reports electronically in place of (or in addition to) the traditional paper bill. Choose from our family of Electronic Billing Information Services® (E-BIS®) if you want to:

- Save on storage space
- · Print out reports on demand
- Zero in quickly on specific information with a few key strokes

E-BIS Options	Features and Benefits
Electronic Intelligent Bill* (EIB*)	 Enables you to view an electronic copy of your paper invoice and management reports, search for specific information, and print selected pages Works with an exceptionally easy-to-use Windows-based software package from Cable & Wireless Monthly invoice available online, on CD-ROM, or on diskette
Call Management Software (CMS)	 Allows you to create customized management reports, call detail reports, and charts and graphs Uses Cable & Wireless-provided software Enables you to mark calls up or down for bill-back purposes Monthly bill available online or on diskette
Call Detail Records (CDR)	 Lets you manipulate call detail records to create customized management reports Works with virtually any spreadsheet and/or database package you already have Monthly call detail records available online, on CD-ROM or on diskette The most efficient solution for businesses with over 35,000 call records



